




**European Bank**  
for Reconstruction and Development

Independent  
Project  
Accountability  
Mechanism

# Institutional Learning Strategy 2025-2029

August 2025

The Independent Project Accountability Mechanism (IPAM) is the project grievance mechanism of the EBRD. It reviews environmental, social, and Project disclosure-related concerns raised by Project-affected people and civil society organisations. IPAM can address concerns through two avenues: i) Problem-solving, which supports dialogue between Requesters and Clients without attributing blame or fault; or ii) Compliance, which determines whether the EBRD has complied with its Environmental and Social Policy and Access to Information Policy in relation to the Project. For information about IPAM, please contact us at [ipam@ebrd.com](mailto:ipam@ebrd.com) or visit [the IPAM webpage](#).

<p><b>Contact information.</b> The Independent Project Accountability Mechanism (IPAM) European Bank for Reconstruction and Development Five Bank Street, London E14 4BG</p> <p>Telephone: +44 (0)20 7338 6000 Email: <a href="mailto:ipam@ebrd.com">ipam@ebrd.com</a></p>	<p><b>How to submit a complaint to the IPAM</b> Concerns about the environmental and social performance of an EBRD Project can be submitted by email, in writing, or via the online form at:</p> <p> <a href="https://www.ebrd.com/project-finance/ipam.html">https://www.ebrd.com/project-finance/ipam.html</a></p>
--	---

---

# Table of Contents

List of Abbreviations	4
I. Background	5
II. Scope	6
a. Knowledge creation	8
b. Knowledge retention	9
c. Knowledge transfer	10
III. Expected outcomes	11
a. Short-term outcomes	11
b. Medium-term outcomes	11
c. Long-term outcomes	11
IV. Implementation plan	12
V. Monitoring and Evaluation	13
a. Evaluation Objectives	13
b. Evaluation Framework	13
c. Evaluation Methods	13
d. Evaluation Timeline	14
e. Roles and Responsibilities	14
f. Reporting and Use of Findings	14

---

## List of Abbreviations

Abbreviation	Long Form
AIP	Access to Information Policy
AI	Artificial Intelligence
CSO	Civil Society Organization
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
ELSy	The EBRD Learning System
ESD	Environment and Sustainability Department
ESP	Environmental and Social Policy
IAM	Independent Accountability Mechanism
IAMNet	Independent Accountability Mechanisms Network
IEvD	Independent Evaluation Department
IPAM	Independent Project Accountability Mechanism
KPI	Key Performance Indicator
MDB	Multi-Lateral Development Bank
PCM	Project Complaint Mechanism
PAP	Project Accountability Policy

## I. Background

The Project Accountability Policy (PAP), approved by the EBRD Board of Directors in 2019, established the Independent Project Accountability Mechanism (IPAM), which has a role to review issues raised by individuals or organisations concerning EBRD financed projects, which are believed to have caused, or to be likely to cause, harm.

IPAM's purpose, as defined by the PAP, is threefold: to facilitate the resolution of social, environmental, and public disclosure issues among project stakeholders; to assess the Bank's compliance with its Environmental and Social Policy (ESP) and the project-specific provisions of its Access to Information Policy (AIP); and, where non-compliance is identified, to address it while working to prevent future occurrences.

An equally important aspect of our work is **institutional learning**. The PAP emphasizes the importance of institutional learning by mandating IPAM to routinely share lessons learned and provide guidance to Bank Management based on evidence, insights, and experiences derived from IPAM's casework. The aim is to distinguish common challenges across EBRD projects, provide constructive recommendations, and promote a culture of continuous learning at EBRD.

After five years of operation, IPAM has accumulated a substantial body of casework that highlights key trends and challenges. These insights can help the Bank enhance how it structures, implements, and monitors its projects, thereby reducing the risk of future grievances and adverse impacts.

This document sets out the institutional learning strategy (2025-2029) that will guide IPAM's approach to fostering organisational learning based on the insights provided by the cases processed by IPAM and its predecessor PCM. It should be viewed as an overarching strategic framework that allows a bird's-eye view of the objectives, principles and methodology that will shape IPAM's institutional learning efforts.

This document is also intended to help key stakeholder groups propose key areas of relevance that will guide IPAM's selection of topics that warrant further analysis, including on-demand products such as deep dives on specific sectors, countries or issues the Bank is particularly interested in.

A detailed plan outlining what IPAM will be producing (specific learning products, activities, timelines) will be presented annually as part of the Work Programme & Budget, thus ensuring responsiveness to emerging Bank needs and priorities.

The strategy also includes a monitoring and evaluation scheme to assess the impact of the programme and allow for adjustments to improve effectiveness.

## II. Scope

The Institutional Learning Strategy builds on IPAM's Policy mandate and establishes the framework for how IPAM generates, analyses, shares, and applies knowledge derived from its casework.

As per the Project Accountability Policy, IPAM will share insights and recommendations with Bank management if all the following criteria are met:

- i. Such insights relate directly to IPAM's mandate to resolve problems or ascertain EBRD's compliance with the ESP or the Project-specific provisions of the AIP.
- ii. Such insights address significant or material issues or trends identifiable through IPAM casework.

Furthermore, as IPAM is part of the IAMNetwork<sup>1</sup>, this strategy includes an inter-institutional component aimed at sharing knowledge and leveraging insights from other Multilateral Development Banks (MDBs), recognising the value of enhanced collaboration and mutual learning.

The primary audiences for IPAM's institutional learning products include, among others:

- The Board of Directors (and its committees, including the Audit and Risk Committee), providing strategic oversight.
- Management committees (including the Operations Committee), supporting decision-making through cross-cutting insights.
- Bank Management and project teams, enabling operational improvements.
- External stakeholders such as clients, civil society organizations, and communities, fostering transparency and accountability.

In alignment with IPAM's Outreach Strategy, tailored communication approaches for the different audiences will be used to ensure relevance and accessibility to each audience group.

### 1. Goal

The IPAM Institutional Learning function exists to extract actionable insights from casework, strengthening the Bank's ability to detect risks early, resolve grievances promptly, and prevent adverse impacts—ultimately minimizing the cost of unresolved conflict.

### 2. Institutional learning framework

The Institutional Learning function of IPAM will be carried out in three sequential stages:

- **Knowledge creation:** Extracting insights from casework and determining their relevance to the Bank's operational context.
- **Knowledge retention:** Organizing and documenting the knowledge generated.
- **Knowledge transfer:** Identifying the most effective channels and methods to share the knowledge with Bank Management, the Board, and external stakeholders.

<sup>1</sup> Independent Accountability Mechanisms Network: a partnership of Independent Accountability Mechanisms practitioners from different MDBs who build institutional capacity on accountability and compliance for improved corporate governance and development impact. As of August 2025, membership includes 23 mechanisms linked to development finance institutions around the world.

In the first stage IPAM mines the data in the case portfolio which includes active and closed cases from 2010 to date, to generate key insights and trends.

The second stage will involve collaboration with relevant departments within the Bank<sup>2</sup> to prioritise focus areas and time-sensitivity to meet Bank priorities. Finally, the third stage will be focused on effective dissemination of the knowledge products focused on accessibility and usability.

### 3. Methodological approach

	Key Action Areas	Sources of information/means of knowledge transfer
Knowledge creation	<ul style="list-style-type: none"> <li>• Creation and updating of an <b>IPAM case database</b> to include data on requests, projects, case decisions and outcomes</li> <li>• Review of <b>Bank project/transaction data</b> to establish linkage</li> <li>• Review of casework from 2010 to present to extract key information to <b>determine priority areas and common issues</b></li> <li>• Establishment of a <b>common data set with other independent accountability mechanisms</b> for comparative purposes</li> </ul>	<ul style="list-style-type: none"> <li>• Requests received and registered</li> <li>• Case processing documents: Assessment reports, Problem Solving Reports, Compliance Assessment Reports, Management Action Plans, Monitoring Reports</li> <li>• Bank project information (including publicly available information, project summary documentation, aggregate project data at country and/or sector level)</li> </ul>
Knowledge retention	<ul style="list-style-type: none"> <li>• <b>Organising insights and information from casework</b> into coherent structures that can be accessed and utilised in the future</li> <li>• Ensuring <b>relevant knowledge is recorded systematically and stored</b> in a way that it is regularly updated and preserved</li> <li>• Developing <b>recurring formats to document key findings, outcomes, challenges, and solutions</b> from casework to ensure uniformity and consistency in how knowledge is retained</li> </ul>	<ul style="list-style-type: none"> <li>• Consultation with relevant units of the Bank to establish priorities; identify best formats and alignment with Bank agenda</li> <li>• Engagement with relevant units to ensure accessibility of products</li> </ul>
Knowledge transfer	<ul style="list-style-type: none"> <li>• Ensuring <b>key insights are communicated to relevant stakeholders</b> (including IAMNetwork members)</li> <li>• Tailoring the delivery of knowledge to the <b>specific needs and interests of different stakeholders</b></li> <li>• <b>Feedback loops</b> with stakeholders (Board, project teams, communities/CSOs): established feedback mechanisms to share and validate findings</li> <li>• Encouraging a culture of <b>continuous learning and open exchange of knowledge</b> within the organization and externally</li> </ul>	<ul style="list-style-type: none"> <li>• Through the IPAM's annual internal and external outreach programme</li> <li>• Collaboration with relevant Bank departments to anchor the products into existing platforms (Lessons Bot) and established learning processes (ELSY)</li> </ul>

<sup>2</sup> The key departments identified, are the Environment & Sustainability Department (ESD), Sustainable Infrastructure Group (SIG), Risk Management, Food and Agribusiness, Natural Resources, Internal Audit, Impact and Partnerships, Independent Evaluation (IEvD).

## **a. Knowledge creation**

This stage deals with the systematic gathering of knowledge generated by cases and the approach is incremental, with four distinctive levels of case insights.

The first level involves the collection of data from the request and the related project, followed by a second level of context provided by a deeper dive on the Bank portfolio. The third level involves harvesting from case reports, to go from basic information identified in the request and the project key characteristics to the outcomes and findings obtained from the IPAM process. The fourth level in knowledge creation is understanding the external context by a comparative analysis with the case portfolios of other independent accountability mechanisms (IAMS).

To enhance this methodology, IPAM may complement the analysis of written sources with targeted interviews with key stakeholders involved in cases, both internal (such as Bank staff and management) and external (such as requesters, clients, civil society organisations) as these may offer qualitative insights and provide a nuanced understanding of drivers, challenges, and opportunities for institutional learning.

- **Creation and updating of a case database to include data on requests, projects, case decisions and outcomes**

IPAM has been collecting case data since 2020 and currently has a core dataset of 100 requests received that provides insights on request drivers and the projects that generate these requests. As cases progress, additional data is generated on processing, decisions made, process outputs, and outcomes.

To strengthen the robustness of the sample, historic case data (49 cases registered) from the Project Complaint Mechanism (IPAM's predecessor), covering the 2010–2020 period, is also integrated. The mining of the database allows IPAM to provide initial case insights on request drivers, type of projects and sectors and to establish priority areas for deeper analytical knowledge pieces and guidance notes.

Depending on the volume and structure of available data, IPAM may explore the use of data analysis techniques (such as AI tools) to identify trends and patterns. These techniques support more efficient data mining, clustering of cases, and insights. In this context, coordination with relevant teams, such as the Independent Evaluation Department (where AI tools are already in use), could be explored to leverage internal expertise and tools.

- **Review of Bank project/transaction data to establish linkage**

IPAM aims at uncovering systemic trends beyond individual cases. While IPAM complaints are related to specific EBRD projects so insights from the individual processing can only be case specific, the aggregate information gathered from the integrated IPAM-PCM case database can flag trends and systemic issues that can inform how the Bank assesses environmental and social (E&S) risks in a sector or a region. In order to increase relevance of the knowledge products, IPAM will consider the general structure of the Bank's portfolio when deciding on focus areas of its research. Greater priority will be given to topics that inform priority sectors/countries/issues within the Bank portfolio.

- **Review of casework from 2010 to present to extract key information to determine priority areas and common issues**

Knowledge creation is foreseen at different levels. The review of casework as an aggregate, focuses on a deep analysis of findings and outcomes, enabling the extraction of institutional learning grounded in factual evidence. The analytical work will move from mapping allegations and perceptions to synthesising outcomes and verified findings.

- **Establishment of a common data set with other independent accountability mechanisms for comparative purposes**

IPAM has been working with several Independent Accountability Mechanisms (IAMs) of other multilateral development banks to define a common set of variables and shared definitions. Through this collaboration, the institutional learning programme will be able to establish comparisons with our key co-lenders to further inform the knowledge pieces produced by IPAM.

## **b. Knowledge retention**

Knowledge retention ensures that insights generated through IPAM's casework are preserved in a systematic and accessible manner to support ongoing and future learning efforts. This stage involves organising and documenting case findings, patterns and recommendations into structured formats that can be readily accessed and utilised by the Board, EBRD teams and other stakeholders. By retaining knowledge in this systematic way, IPAM provides a durable and evolving repository of institutional memory, enabling EBRD to integrate lessons learned into project design, implementation, and monitoring processes over the long term.

Below are some key points which must be considered to ensure consistency, accuracy and relevance of this strategy to the Bank's operational priorities:

- **What?**

The insights generated in the first stage will need to be circulated amongst relevant Bank areas to help determine the priority order, but also the depth of analysis needed by the users and learners.

- **When?**

For the knowledge products to be relevant, these have to help inform decision making. Therefore, IPAM identifies with key stakeholders the most relevant decision milestones in the Bank's agenda and will provide analytical learning products that assist the process.

- **How?**

For knowledge products to be used, they need to be aligned with the way the Bank learns and the pace of the institution. IPAM will present knowledge products in formats such as microlearning modules and one-pagers (among others) that provide quick insights into a topic.

- **Where?**

IPAM will ensure that any knowledge product generated can be accessed easily by the users. The Intranet will be used as a home to these products, but IPAM will also liaise with teams across the Bank to establish links to other relevant systems.

The coordination with Internal Audit and Independent Evaluation departments will be ongoing to avoid duplication of effort, build synergies, strengthen the products generated and ensuring alignment with the Bank's broader learning frameworks.

IPAM seeks to create a library of case studies grouped by priority areas or significant issues. Given the limited resources, the institutional learning strategy envisions a progressive construction of this library, ensuring the knowledge products generated are the most impactful in terms of institutional learning.

### c. Knowledge transfer

According to the Project Accountability Policy, IPAM may communicate institutional learnings in one of the following vehicles:

- **Writing:** via the annual report and via other outreach materials, as appropriate
- Workshops and other **direct engagement methods**
- **Submission of formal comments** on draft EBRD policies or country and sector strategies
- **To the Board and Management Committees**, at the presentation of its Annual Report, or on an as-needed basis (one-pagers).

Primary recipients of this knowledge include EBRD Management, to inform operational adjustments and decision making, and the Board of Directors and Management Committees, to support oversight and strategic guidance. But also relevant are IPAM's external stakeholders: EBRD clients and civil society organisations.

In line with this, the dissemination of knowledge products will be undertaken as part of the Internal and External Outreach programme of IPAM.

An inclusive and iterative feedback process will be integrated into the development of institutional learning products, engaging Bank Management and other stakeholders at multiple stages. This includes early consultation on concept notes and review of draft products.

To ensure long-term and practical relevance of this knowledge, IPAM will seek to embed selected lessons and insights into the Bank's existing platforms. Some of the knowledge products will be made available via the Intranet and/or IPAM's internet page. Additionally, where relevant, some materials may be incorporated into the Bank's learning modules (such as Elsy) and Lessons Bot. In the medium term, IPAM envisions embedding institutional learning insights into Banking tools (such as Monarch, the Bank's internal tool for managing the project lifecycle) enhancing visibility and relevance for operational teams.

## III. Expected outcomes

### a. Short-term outcomes

The immediate expected outcomes include:

- Increased awareness of accountability recurring issues: stakeholders (particularly the internal ones) will have a better understanding of key accountability challenges, recurring issues and interventions.
- Strengthened project design and monitoring processes: projects team will begin to apply lessons in design and monitoring phases, particularly for recurring issues.
- Enhanced stakeholder trust: stakeholders see IPAM as a reliable and transparent source of information and guidance.

### b. Medium-term outcomes

If the short-term outcomes are realised, the following medium-term changes are anticipated:

- Reduced recurrence of accountability issues: common issues highlighted by IPAM are less likely to occur following the improvement of practices.
- Institutional changes to policies and guidelines: the EBRD updates relevant policies, standards and guidelines based on IPAM's thematic guidance and recurring case findings.
- Enhanced capacity for risk mitigation: project teams adopt proactive approaches to risk identification and mitigation based on lessons shared through IPAM.

### c. Long-term outcomes

Over time, IPAM's learning strategy is expected to contribute to the following long-term impacts:

- Increased accountability and transparency at EBRD: EBRD is viewed as a transparent and accountable institution by stakeholders, fostering trust and cooperation.
- Improved project outcomes: projects are more considerate of community issues, reducing adverse impacts on affected populations.
- A culture of continuous learning: accountability, learning and improvement are embedded into EBRD's culture, enhancing long-term project success and reducing risks.

## IV. Implementation plan

This strategy will guide IPAM's institutional learning approach over a five-year period (2025-2029). Its implementation will be dynamic, evolving in response to internal priorities, insights, and stakeholder feedback.

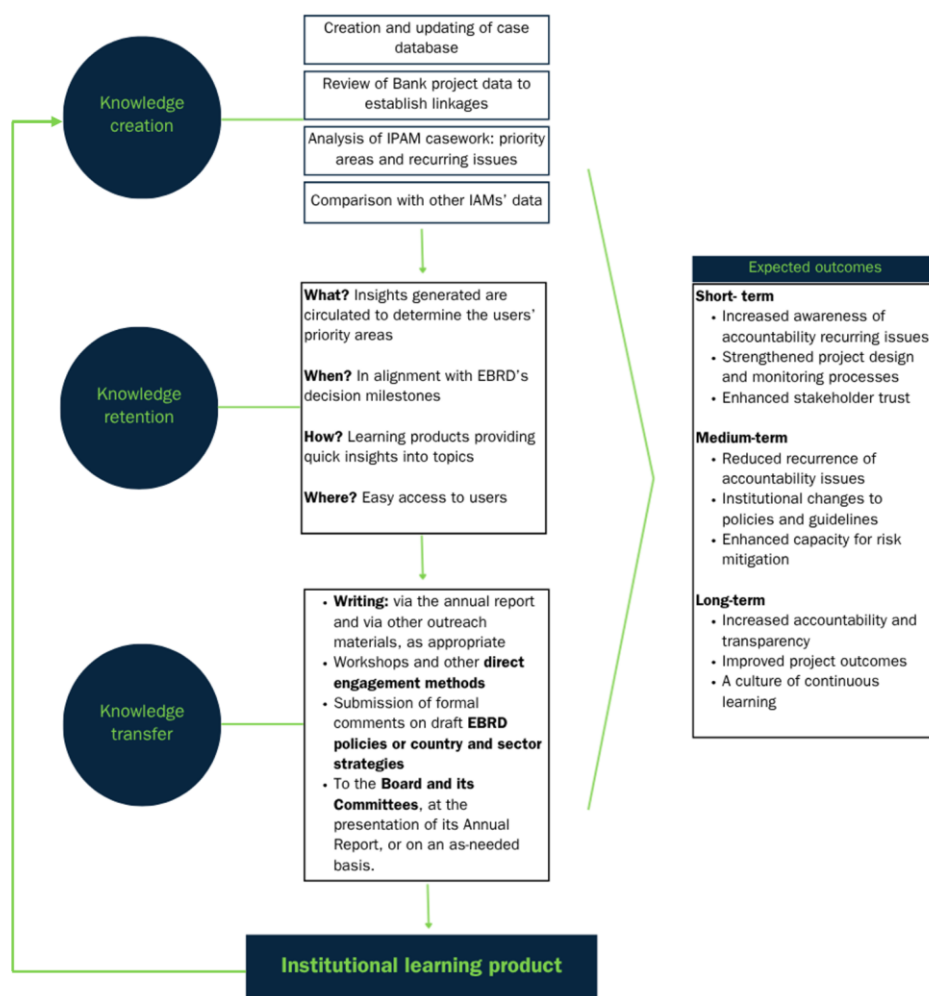
Each year the person within IPAM responsible for institutional learning will develop an annual roadmap to operationalise the strategy outlining timelines, possible priority themes and knowledge products, responsible parties and key milestones. This plan will be prepared with input from Bank Management and relevant departments, ensuring alignment with institutional priorities and avoiding duplication. The establishment of a coordination mechanism with ESD and Management will provide opportunities for input at key stages (initial concept development, draft product review) enhancing quality, relevance and usability of learning products.

To differentiate IPAM's knowledge products from existing Bank materials, IPAM will identify areas where case-driven accountability lessons will add unique value.

The format of knowledge products will vary according to the type of information being shared, as appropriate.

The IPAM team responsible for Outreach will ensure learning products reach the relevant audiences.

### Institutional learning process flowchart



## V. Monitoring and Evaluation

The implementation of this Institutional Learning Strategy will be monitored and evaluated to ensure its effectiveness. This section presents the general framework to be used for evaluation purposes

### a. Evaluation Objectives

- Assess the **effectiveness** of institutional learning activities in influencing Bank practices.
- Measure the **reach and relevance** of knowledge products across stakeholder groups.
- Evaluate the **impact** of learning outputs on project design, monitoring, and policy development.
- Ensure **continuous improvement** through feedback and adaptive learning.

### b. Evaluation Framework

	Key Questions	Indicators	Data Sources
Relevance	Are learning products aligned with Bank priorities and stakeholder needs?	<ul style="list-style-type: none"> <li>• % of products aligned with priority sectors/countries</li> <li>• Stakeholder satisfaction scores</li> </ul>	<ul style="list-style-type: none"> <li>• Annual stakeholder survey</li> <li>• Feedback from Management Committees</li> </ul>
Effectiveness	Are knowledge products being used in decision-making and project design?	<ul style="list-style-type: none"> <li>• # of references to IPAM insights in project documents</li> <li>• # of policy or guideline updates informed by IPAM</li> </ul>	<ul style="list-style-type: none"> <li>• Project documentation</li> <li>• Policy revision logs</li> </ul>
Efficiency	Are resources used optimally to produce and disseminate learning products?	<ul style="list-style-type: none"> <li>• Time and cost per product</li> <li>• Staff hours allocated vs. output</li> </ul>	<ul style="list-style-type: none"> <li>• Internal reporting</li> <li>• Budget and resource tracking</li> </ul>
Reach	Are products reaching intended audiences effectively?	<ul style="list-style-type: none"> <li>• # of downloads/views of products</li> <li>• # of outreach events held</li> <li>• Diversity of stakeholder engagement</li> </ul>	<ul style="list-style-type: none"> <li>• Web analytics</li> <li>• Outreach programme reports</li> </ul>
Impact	Are IPAM insights contributing to improved project outcomes and reduced grievances?	<ul style="list-style-type: none"> <li>• Reduction in recurrence of flagged issues</li> <li>• Improved stakeholder trust ratings</li> <li>• Evidence of proactive risk mitigation</li> </ul>	<ul style="list-style-type: none"> <li>• Case database trends</li> <li>• Stakeholder perception surveys</li> <li>• Monitoring reports</li> </ul>

### c. Evaluation Methods

- **Quantitative Analysis:** Use proposed KPIs to track outputs and engagement.
- **Qualitative Assessment:** Conduct interviews and focus groups with internal and external stakeholders.
- **Case Studies:** Deep dives into selected projects to trace influence of IPAM insights.
- **Comparative Benchmarking:** Leverage IAMNetwork data to compare performance and practices.

**d. Evaluation Timeline**

- Annual Review: Integrated into the annual Work Programme & Budget cycle.
- Mid-Term Evaluation (2027): Assess progress and recalibrate strategy if needed.
- Final Evaluation (2029): Comprehensive assessment of outcomes and long-term impact.

**e. Roles and Responsibilities**

- IPAM Institutional Learning Lead: Coordinates evaluation activities and reporting.
- Independent Evaluation Department (IEvD): Provides methodological support and validation.
- Bank Management & Stakeholders: Participate in feedback loops and provide input.

**f. Reporting and Use of Findings**

- Findings will be shared via:
  - Annual Reports
  - Updates to the Board and Management Committees
- Evaluation results will inform:
  - Adjustments to the strategy
  - Prioritization of future learning products
  - Improvements in dissemination and stakeholder engagement

The **Independent Project Accountability Mechanism (IPAM)** is the project grievance mechanism of the EBRD. It reviews environmental, social, and Project disclosure-related concerns raised by Project-affected people and civil society organisations. IPAM can address concerns through two avenues: i) Problem-solving, which supports dialogue between Requesters and Clients without attributing blame or fault; or ii) Compliance, which determines whether the EBRD has complied with its Environmental and Social Policy and Access to Information Policy in relation to the Project. For information about IPAM, please contact us at [ipam@ebrd.com](mailto:ipam@ebrd.com) or visit the [IPAM webpage](#).



**European Bank**  
for Reconstruction and Development

Independent  
Project  
Accountability  
Mechanism

## Contact information

The Independent Project Accountability Mechanism (IPAM)  
European Bank for Reconstruction and Development  
Five Bank Street,  
London  
E14 4BG

Telephone: +44 (0)20 7338 6000  
Email: [ipam@ebrd.com](mailto:ipam@ebrd.com)

## How to submit a complaint to the IPAM

Concerns about the environmental and social performance of an EBRD Project can be submitted by email, in writing, or via the online form at:

<https://www.ebrd.com/project-finance/ipam.html>